



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 17, 2020

Via ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 443
New York, New York 10007

Re: United States v. Armando Gomez, 18 Cr. 262 (VEC)

Dear Judge Caproni:

We write to update the Court on the status of the above-referenced matter. As detailed in the Government's update letter of July 7, 2020, Dkt. 38, the Government has produced in discovery over 250 audio and/or video recordings; draft translations of certain of these recordings; a search warrant for the defendant's electronic devices seized in connection with his arrest and reports concerning the execution of this search warrant; reports prepared by the Drug Enforcement Administration during the course of this investigation; and materials received from Colombia related to this investigation. Since that update, the Government has also produced a copy of much of this material to the defendant at his prison facility. Defense counsel advises that review of this material is ongoing, and the defendant's own review has been limited, in part, by limitations in place due to COVID-19 and technological issues that the defendant has faced during the course of his review. More specifically, the defendant is allowed to review his discovery for approximately one hour per day. As such, the parties respectfully propose that the Court adjourn this matter for 60 days, at which time, absent further complications, the parties will be prepared to either propose a motion schedule or inform the Court that the parties have reached a disposition.

In addition, the Government respectfully requests, with the consent of defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(6) and (7)(A), until the date of the next status conference, as the defendant's co-defendants remain in Colombia pending extradition, so that defense counsel can continue to review the discovery material and contemplate potential motions, and due to the COVID-19 pandemic.

Respectfully submitted,

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cc: Margaret M. Shalley, Esq. (by ECF)